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Mr. Kenneth Payne, Chief
Marketing Programs, Livestock, Seed Programs
United States Department of Agriculture
Agricultural Marketing Service
Washington, DC

RE: Docket Number LS-05-07; December 2, 2005 Page 72257

Dear Mr. Payne:

I am writing this letter to convey my feelings about the current state of affairs with our National Soybean Check-Off.

In 1990 the National Soybean Check-off was implemented as a way for all U.S. soybean farmers to invest in marketing and promoting their product. At that time the American Soybean Association worked hard to pass this national program. Both before and after implementation of the national program the American Soybean Association has been instrumental in administering and carrying out the international marketing programs that have been vital to developing new markets and building existing outlets throughout the world. This program has been a model for other programs within FAS and therefore very successful.

Regardless of the successes of the national check-off program since its inception I feel it has its weaknesses as well. These weaknesses have come about for various reasons. Some of these include the appointment of USB Directors instead of their being elected. This leads to a lack of accountability to their fellow soybean farmers who are the ones who are providing the funds. The lack of the ability for refunds also is troublesome as is the procedure for addressing issues that come up within the act and order. The current system of voting for a referendum is likely never to produce a healthy review of changes that need to be made to this program. I doubt that the numbers being touted as "soybean farmers" is accurate and my opinion is that unless you receive a portion of a crop as a farmer or land owner you should not be able to vote. Also, the voting should take place during the time of year when farmers are less busy.

Most recently the actions taken to form a new international marketing structure within the auspices of the USSEC are abdominal. A third organizational structure, in effect another layer of unnecessary staffing, meetings, etc. is totally inefficient. I have strong

reservations about the success of this new program. Yes, the national soybean organization plays a part of this new group, but was forced to join under duress.

In closing, soybeans have been an important part of my family's history. My grandfather was instrumental in the introduction of soybeans to the mid-south in 1926 and since that time many members of our family have been involved with promoting this crop in many ways. This history is the reason I'm taking the time to write this letter. The soybean check-off must be improved to better serve those whose livelihood depends on this crop.

I appreciate your taking the time to read these comments and I would look forward to visiting with you about my concerns should you be interested.

Very truly yours,

Douglas A. Hartz